

thin ice,” and that upper management had “lost confidence” in him, and that he was “not technically astute.”

14. The following day Plaintiff spoke with Mr. Richards about his younger co-worker going on the trip to Poland instead of him, and also told him that he felt he was being marginalized by Mr. Calvert since Calvert had become his boss in 2013. Richards told him he should not be made to feel that way, and that they should think about it over the weekend.

15. On Monday, September 8, 2014 Plaintiff spoke with Chris Davis, the Chief Financial Officer who also had responsibilities for HR, about Creneti being selected to go on the trip rather than him and about his discussions with Calvert and Richards. He also told Davis that it was uncomfortable for him working with Mr. Calvert, and that he thought it was a “hostile environment.”

16. Plaintiff was terminated by Mr. Richards on Tuesday, September 9, 2014. Richards told Plaintiff that he was being terminated because the company had no confidence in him, and said that his termination “had nothing to do with your speaking with Chris Davis.”

17. Even before Creneti had been selected to go on the trip to Defendant’s client in Poland instead of Plaintiff, aspects of Plaintiff’s job duties were taken from him and given to Creneti, specifically the duty of assisting and working with regulatory committees such as that referred to as “ISO.”

18. Shortly before Plaintiff’s termination, Defendant had also replaced Don Peng, a Chemist who was in his mid-forties, with a younger individual in his 20s.

19. Plaintiff believes and therefore avers that his termination by Defendant was motivated by his age and/or his objection to the discriminatory conduct of Defendant with regard to its actions in selecting Mr. Creneti and the “hostile environment” created by Mr. Calvert.